

Reges v. Cauce, et al.

Exhibit D
to Declaration of
Gabriel Walters

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STUART REGES,)	No.
)	
Plaintiff,)	2:22-cv-00964-JHC
)	
vs.)	
)	
ANA MARI CAUCE, et al.,)	
)	
Defendants.)	

Videotaped
Deposition Upon Oral Examination Of
MAGDALENA BALAZINSKA

June 19, 2023
401 Union Street, Suite 3300, Seattle, Washington
Magna Legal Services
(866) 624-6221
www.MagnaLS.com

REPORTED BY: PEGGY FRITSCHY HAMILTON, RPR, CSR, CLR,
29906/No. 2704

1	E X H I B I T S		
2	NO.	DESCRIPTION	MARKED
3	1	January 13, 2023 email to Mark	46
4		Richards from Magdalena Balazinska	
5	2	U.S. Department of Arts and Culture	52
6		"Honor Native Land: A Guide and Call	
7		to Acknowledgment"	
8	3	Office of Minority Affairs &	58
9		Diversity, "About OMA&D"	
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12		Magdalena Balazinska	
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22		from Elise deGoede Dorough	
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5		Balazinska	
6	11	Email chain, top email to Dan	128
7		Grossman, and others, from Magdalena	
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11	13	Email chain, top email to Phillip	149
12		Reid from Magdalena Balazinska	
13	14	Note about course syllabus	153
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4		diversity-allies from diversity-allies	
5		on behalf of Stuart Reges	
6	20	Email chain, top email to Magdalena	199
7		Balazinska, and others, from Nancy	
8		Allbritton	
9	21	March 2, 2022 email to Stuart Reges	203
10		and Aileen Trilles from Magdalena	
11		Balazinska	
12	22	March 10, 2022 email to Stuart Reges	220
13		and Dan Grossman from Magdalena	
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15	23	March 21, 2022 email to Nancy	228
16		Allbritton from Magdalena Balazinska	
17	24	July 11, 2022 letter to Associate	238
18		Professor Louisa Mackenzie, and others,	
19		from Nancy Allbritton	
20	25	August 24, 2022 email to Eric	241
21		Schnapper and Louisa Mackenzie	
22		from Magdalena Balazinska	
23	26	June 7, 2022 email to engr-chairs,	243
24		and others from Nancy Allbritton	
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2 NO. DESCRIPTION MARKED

3 27 June 13, 2023 letter to Teaching 246

4 Professor Stuart Reges from Nancy

5 Allbritton

6 28 April 5, 2022 email to Stuart Reges 260

7 from Magdalena Balazinska

8 29 Email chain, top email March 31, 264

9 2022 to Chloe Dolese Mandeville, and

10 others, from Elise deGoede Dorough

11

12 E X A M I N A T I O N

13 BY PAGES

14 ATTORNEY DIAZ 8 - 275

15

16 ***** (* Denotes phonetic spelling.)

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1 partnering with other units on campus.

2 We have different projects. Like for
3 example, the Allen Endowment. And if a faculty member
4 has an exciting idea, I can provide them, like, some
5 start-up funds for that idea, and negotiate offers
6 with new faculty members. So the list goes on and on.

7 Q. Sounds like a big job.

8 A. It's a very, very big job.

9 Q. Would you say it also includes responding to
10 student concerns?

11 A. Oh, it did definitely includes responding to
12 student concerns, yes.

13 Q. It includes responding to staff concerns?

14 A. Yes.

15 Q. Donor concerns?

16 A. Yes.

17 Q. Does it include involvement in faculty
18 disciplinary matters?

19 ATTORNEY HOSP: Object to the form.

20 But you can answer.

21 A. Yes.

22 Q. And it includes involvement in student
23 conduct matters as well?

24 ATTORNEY HOSP: Object to the form.

25 You can answer.

1 generally?

2 ATTORNEY HOSP: Object to the form.

3 Q. Well, let me -- that's what you do --

4 A. That's what I do.

5 Q. -- when you are teaching?

6 And when you -- in your role as director,
7 is a part of your responsibility to review course
8 syllabi?

9 A. No.

10 Q. Do you -- does anyone, anyone, other than the
11 individual professor, review course syllabi before
12 they're posted on the course website?

13 A. I don't believe so.

14 Q. And so professors don't, and -- you know,
15 they don't have to go through any -- excuse me. Let
16 me back up.

17 Do professors have you go through any
18 process for reviewing -- any process for, of review
19 for their course syllabi?

20 ATTORNEY HOSP: Object to the form.

21 You can answer.

22 A. I don't think so.

23 Q. And is that because the syllabus is the
24 purview of the teacher, I guess?

25 A. I mean, there are many things we do without

1 Q. And do you have any reason to believe this is
2 not the email that you sent to students on
3 January 5th?

4 A. No.

5 Q. And in the email on paragraph -- in paragraph
6 3, you note, "I encourage you to submit a complaint
7 through one of the following channels. These
8 complaints are taken very seriously," and you list
9 three channels within --

10 A. Um-hum.

11 Q. -- the University of Washington for purposes
12 of complaints; right?

13 ATTORNEY HOSP: Object to the form.

14 You can answer.

15 A. Right. So this is -- I mean, as we were
16 discussing, one of the complaints that a student had
17 voiced said that they were worried they would not be
18 treated fairly. And as we discussed, I did not
19 expect -- I mean, I expected Reges to treat everyone
20 fairly. I had no reason to believe otherwise. So I
21 specified that I would like to assure everyone that
22 they can expect to be treated fairly, since that was
23 my expectation.

24 But since in the morning students took to
25 social media, and this has been something standard

1 gave Stuart the opportunity to propose possible
2 resolutions or to work together to producing a
3 mutually agreement resolution, and he only preferred
4 to receive our written version of what is proposed
5 below, with that main point being simply not to put
6 that statement in.

7 The second point is just a general point,
8 that is, as an Allen School faculty member, you know,
9 he will interact with peers, staff, and students in a
10 way that -- and, demonstrates respect toward all and
11 encourages a spirit of respect in all
12 interactions...Creates and maintains a professional,
13 positive, and welcoming environment that is conducive
14 to learning, teaching, research, and service, and, If
15 expressing dissent or attempting to produce change in
16 the workplace, do so in a way that remains respectful
17 to all, and in a way that maintains a professional,
18 positive, welcoming, and supporting environment.

19 Oh, and also a bullet point, which is
20 standard, like, You agree that you will avoid any
21 retaliation against anyone whom you believe is
22 involved with the allegations that we have discussed
23 with him at the 25-71 meeting.

24 Q. Do you have any reason to believe that Stuart
25 retaliated against anyone for anything related to his

1 land acknowledgment statement?

2 A. I'm not aware of any retaliations. No one
3 voiced any issues with retaliation.

4 Q. Bullet number one says that -- so there are
5 three bulleted terms here; right?

6 A. Correct.

7 Q. In this letter. And the first bullet talks
8 about how Stuart will interact with peers, staff, and
9 students; right?

10 A. (Witness nods head.)

11 Q. It says that, you know, he has to demonstrate
12 respect; right?

13 A. (Witness nods head.)

14 Q. And as you read them all out, how would you
15 determine whether -- say he accepted this --

16 A. Um-hum.

17 Q. -- agreement. How would you have determined
18 that he "demonstrated respect towards all and
19 encourages a spirit of respect in all interactions and
20 forums"?

21 ATTORNEY HOSP: Object to the form.

22 You can answer.

23 A. I mean, typically this is based on if I
24 receive any complaints in any forms. So if someone
25 comes to me and says that, you know, they feel